

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA

In re:

J&J Oilfield Services, Inc.,  
Debtor.

Bankruptcy No. 13-30607  
Chapter 11 Bky

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**MOTION FOR EXPEDITED RELIEF**

**TO: DEBTORS AND THEIR COUNSEL; AND ALL PARTIES IN INTEREST**

1. **COMES NOW**, Union State Bank of Fargo (“Bank”) by and through its counsel, and for its Motion for Expedited Relief pursuant to Federal Rule 9006 states as follows:
2. **Background.**
3. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334 of Title 28 of the United States Code. This is a core proceeding pursuant to § 157(b) of Title 28 of the United States Code. The petition commencing this Chapter 11 case was filed on September 13, 2013. This case is now pending in this Court.
4. This Motion arises under Bankruptcy Rule 9006.
5. **Moving Party’s Request for Relief.**
6. Bank requests that the Court: (a) reduce the time period for filing objections to Bank’s Motion for Relief from Stay from 14-days to 7-days; (b) that the Court hold an expedited hearing on Bank’s Motion for Relief from Stay by no later than October 7, 2013; and (c) any hearing set by the Court to be heard at Quentin N. Burdick United States Courthouse, 655 1st Avenue N, Courtroom #3, Fargo, ND 58102.
7. **The Granting of the Requested Relief is Appropriate for the Following Reasons:**
  - a. The equipment is not being properly maintained.

- b. The Debtor is not a licensed contractor.
  - c. The Debtor lacks any equity in the equipment.
  - d. The Debtor's insurance on the equipment is about to expire.
  - e. The Debtor does not have worker's compensation insurance coverage.
  - f. Many of the vehicles subject to the Bank's security interest do not have current licensing and are not compliant with the rules and regulations of the Department of Transportation.
8. Therefore, Bank requests that the Court: (a) reduce the time period for filing objections to Bank's Motion for Relief from Stay from 14-days to 7-days; and (b) that the Court hold an expedited hearing on Bank's Motion for Relief from Stay at the Court's convenience, so that a hearing and the Court's decision can occur no later than October 7, 2013; and (c) any hearing set by the Court to be heard at Quentin N. Burdick United States Courthouse, 655 1st Avenue N, Courtroom #3, Fargo, ND 58102.
9. **PLEASE TAKE NOTICE**, because this Motion is brought on an **expedited basis**, any response to the Motion must be filed and served by delivery as soon as possible and it is suggested that a response to this Motion and a response to Bank's Motion for Relief from Stay be filed at least 24 hours prior to the hearing or earlier as the Court may deem appropriate.

Dated this 25 September 2013.

TURMAN & LANG, LTD.

/s/ Katrina A. Turman Lang  
KATRINA A. TURMAN LANG (#06119)  
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Attorneys for Union State Bank of Fargo

STATE OF NORTH DAKOTA)

AFFIDAVIT OF SERVICE

) ss.

COUNTY OF CASS )

JANELLE ALBRECHT, being first duly sworn upon oath, deposes and says that she is of legal age; that on September 25, 2013, she served the attached:

**MOTION FOR EXPEDITED RELIEF**

RE: Union State Bank v. J&J Oilfield Services, et al  
Bankruptcy No.: 13-30607  
Our File No.: 6611.4

Upon the following person(s):

- Lee A. Henderson lhenderson@hessianmckasy.com
- KIP M. KALER kip@kaler-doeling.com, ND04@ecfcbis.com
- Robert B. Raschke USTPRegion12.SX.ECF@usdoj.gov
- Joseph A Turman jturman@turmanlaw.com, Janelle@turmanlaw.com
- Sarah Wencil sarah.j.wencil@usdoj.gov

By filing and serving the same through ECF file and serve.

RDO Equipment Co.  
Attn: Duane Hoven  
P.O. Box 7160  
Fargo, ND 58106

And by depositing the same with postage prepaid in the United States Mail at Fargo, North Dakota.

/s/ Janelle Albrecht

JANELLE ALBRECHT

Subscribed and sworn to before me on September 25, 2013.

(S E A L)

/s/ Katrina A. Turman Lang

NOTARY PUBLIC

My Commission Expires: 11/30/17